



*Formerly The Foundation for Taxpayer & Consumer Rights*

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May 14, 2008

Chairman Ross Johnson  
Commissioners Hodson, Huguenin, Leidigh and Remy  
Fair Political Practices Commission  
428 J Street  
Sacramento, CA 95814

*Via Facsimile*

Re. Agenda Item #5:  
Reporting expenditure of campaign funds for gifts, meals and travel

Dear Chairman and Commissioners:

Consumer Watchdog strongly supports increased disclosure of the political, legislative or governmental purpose of campaign expenditures for in-state travel. The proposed amendment will provide the Commission and the public better means to gauge whether public officials are spending campaign money legally, or misusing it for their own personal benefit.

If properly interpreted, new regulations for gift, meal and travel expenditures will help ensure honest political spending. However, we urge you to set clear guidelines for candidates to follow. We believe two amendments are necessary to ensure smooth functioning of the new rules: 1) Require travel disclosures to include itineraries and agendas, and require travel and meal disclosures to include a list of participants; 2) Specify that no meal, gift or travel expense can be reported as a "meeting," "office expense" or "fundraising."

The additional disclosure of itineraries, agendas and attendees (similar information is required of Congress under new ethics rules) would bolster the otherwise vague "brief description" required of the political, legislative or governmental purpose of an expense. As we have noted before, if a week-long trip includes just one three-hour seminar, it is difficult to justify as a legitimate use of campaign funds. Neither the Commission nor the public could determine if funds were spent appropriately without that additional information.

Wide-open descriptions of expenditures can also act to camouflage purchases that do not always have an obvious legal purpose and often appear to be for personal benefit. The new regulations should specify that gifts, meals and travel cannot be reported as

"meetings," "office expenses," "fundraising" or in other vague terms, even if those descriptions are otherwise accurate. These adjustments will discourage subterfuge and close a possible loophole in the new regulations before they take effect.

Thank you for attention, and for tackling a serious problem with campaign disclosure regulations.

Sincerely,

A handwritten signature in black ink, appearing to read "Carmen Balber", with a long horizontal flourish extending to the right.

Carmen Balber

cc: Brian G. Lau, Commission Counsel  
Scott Hallabrin, General Counsel